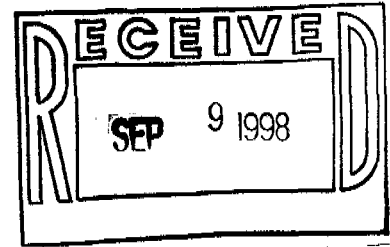




KAISER - HILL
COMPANY



INTEROFFICE MEMORANDUM

DATE: September 3, 1998
TO: Pete Sauer, RMRS/Facility Manager, Bldg. T893A, X5957
FROM: ^{RCN} Robert Nininger, Environmental Compliance & Operations, Bldg. T130C, X4663
SUBJECT: RAD-NESHAP MONITORING REQUIREMENTS IN BUILDINGS 991 AND 985 - RCN-016-98

Air Quality Management (AQM) has reviewed the dispersible radionuclide sources associated with the material storage vaults and rooms in Building 991 to determine their potential to discharge radionuclides into the air in quantities which require continuous effluent monitoring. The room air from the vaults and storage rooms are vented to plenum systems 985 and 991-MAI.

AQM reviewed documentation and performed a visual inspection of the vaults and rooms to determine if radioactive waste and special nuclear material (SNM) were properly packaged and stored in approved containers which meet the criteria of a sealed source.

Based on this recent assessment there are no SNM activities currently in process or planned that entail handling or processing of or other radioactive material in any form other than sealed containers. All radioactive materials and SNM in Building 991 are stored in containers that meet the criteria of a sealed source. Since no materials are being handled or processed with the potential to release radioactive particles or gases to the atmosphere, AQM has determined that monitoring is currently not required in Building 991 and 985.

AQM has discontinued using the existing multi-point effluent air samplers in Buildings 985 and 991.

To demonstrate compliance with 40 CFR 61, Subpart H and Colorado Air Quality Control Commission Regulation No. 8, all release points in Building 991 will need to be reevaluated periodically to determine any changes in source activities for monitoring status.

This correspondence supercedes the letter from "R. C. Nininger ltr. to R. P. Dunn, Rad-NESHAP Monitoring Requirements in Building 991 - RCN-008-98, dated April 20, 1998." If you need additional assistance or have any questions or concerns you may contact Aaron McManigle at extension 7240.

APM

cc:

R. M. Garren
~~T. H. Hopper~~
M. H. Hyder
A. P. McManigle
V. L. Orozco
C. A. Patnoe
C. E. Trump
D. A. Ward
S. L. Wilson

-SAFE AND COMPLIANT CLOSURE-

ADMIN RECCRD

1A-A-000422

1/3

Jim, Included is the status of the 13 items slated for correction during this FY.

Total Identified	Total Corrected
60	35.6 goal 36

Completed the following priorities this past week:

The roof repairs associated with the leak on the 480 volt bus duct. LO/TO is about 60% complete. All of it was scheduled to be completed, but crafts reassigned to B444 for security issues. LO/TO scheduled to work today and Tuesday. This will complete this effort prior to the year end. All of the 36 items that were scheduled to be completed during this FY will have been completed on schedule and below budget.

Presently working the following items:

Priority

- 2- Working RCRA waste identification & management items. **100%** complete, ballast issue completed, circuit boards completed, and waste light bulbs completed.
 - 4- All Idle Equipment inventoried, oil quantities determined, (approximately 9,000 gallons) 19 sampling requests initiated & **all items sampled for PCB's, VOA's, metals, & gross alpha/beta. None are expected to need immediate management under the Consent Order. 100% of this FY work completed.**
 - 6- Roof leak over electrical bus. **Completed.**
 - 8- LO/TO scheduled to be completed today and Tuesday
 - 11- SSOC performed assessment for cost to complete Criticality survey. Called SSOC again last week, still no response. **My role in this is completed.**
-
- Smoke tests are scheduled to **begin this week** to evaluate the need for 140 air heads in the two buildings. If this program can be minimized a real cost savings will be made. Saved funds will be dedicated to packing waste.
 - Combustible removal is continuing. An additional **60 bags of tools and supplies** are ready to be released to PU&D under the PRL log protocol.
 - Furniture removal from 2nd floor of B883 scheduled to be completed this week. **The trailer is staged at Building 883. SSOC PM kept this from being completed last week.**
 - Surplus items on south side of B883 **were shipped to PU&D last week. Two flat bed truck loads.**
 - **Steam was introduced into both buildings. PMT's conducted on replaced heating system parts.**
 - **Three additional PRE's** written to allow free release fire bricks, shear and brake, as well as cooling tower motors.
 - **The MTS System** was shipped from the site.
 - **The Tarps** were received to cover the outside waste crates.
 - **Closed 6 assessment findings per Proctors Enterprise.**
 - **12 "used oil" drums were sampled for free release, a waste minimization effort.**

Any questions call me on extension 2729. I trust you had as nice a birthday as I did.

HIGHLIGHTED ENVIRONMENTAL ISSUES AND CONCERNS

9/21/98

- CDPHE did not conduct any RCRA inspections last week. Currently, CDPHE has scheduled a tour on Tuesday, 9/22/98 of the Decontamination Pad inside the PA, and the process waste tanks in Bldg. 776 focusing on an issue regarding the secondary containment. Details are being finalized.
- The K-H Team met with CDPHE to discuss and provide a status of the Consent Order commitment to achieve a RCRA Stable condition for several tanks in Bldg. 774 by 9/30/98. Both parties agreed that we should track progress closely, and if it is determined that an extension request is necessary, formally request one at that time. Currently, RMRS is scheduled to begin operation of the OASIS system today.
- The K-H Team formally requested a change to the Compliance Advisory commitment to complete decontamination of several pieces of debris at the Solar Ponds by 9/30/98. Since the K-H Team and CDPHE agreed that the Permit Modification to operate the Decon Pad should go through Public Comment, a new commitment date was agreed to. The new commitment date is to complete decontamination of the debris 67 days after Permit Mod approval. We expect Permit Mod approval sometime this week.
- An issue involving treatability study waste has been identified in Building 701. It appears that treatability study waste was stored there longer than the 5 year time period allowed per the RCRA regulations for archiving waste. This waste has been moved into a 90-day accumulation area and is now being managed properly. Facts are being gathered for formal disclosure to CDPHE.

-Safe and Compliant Closure-